

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Juan Carlos Hernandez-Ramirez

Principal

YOB: 1998

the United Mexican States

United States District Court
Southern District of Texas
FILED

AUG 21 2016

CRIMINAL COMPLAINT

Case Number:

M-16-1549-M

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 19, 2016 in Hidalgo County, in the Southern District of Texas defendants(s) did, *(Track Statutory Language of Offense)*

knowing or in reckless disregard of the fact that Ramon Adalberto Lobo-Hernadnez, citizen and national of Honduras and Samuel Martinez-Abelino, citizen and national of the United Mexican States, along six (6) other undocumented aliens, for a total of eight (8), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Cuevitas, Texas to the point of arrest near Sullivan City, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 19, 2016, McAllen, Texas, Border Patrol Agents assigned to the Sullivan City, Texas area received a call for assistance from the Sullivan City Police Department. Border Patrol Agent F. Ornelas, responded to area of El Pinto Road and Tabelaado Street where he made contact with Sullivan City Police Officer Quintanilla. Quintanilla stated he saw a beige Chevrolet Malibu traveling north at a high rate of speed on El Pinto Road and conducted a traffic stop for speeding. Officer Quintanilla advised he made contact with the driver, Juan Carlos Hernandez-Ramirez, and asked for his driver's license. Juan Carlos Hernandez-Ramirez told Officer Quintanilla he did not have a valid driver's license and Hernandez-Ramirez was placed under arrest.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No



Signature of Complainant

Jerrico P. Leason

Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

August 21, 2016

Date

at McAllen, Texas

City and State

Dorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16-1549-M

RE: Juan Carlos Hernandez-Ramirez

CONTINUATION:

Officer Quintanilla then asked the other eight subjects inside the car for identification cards and all eight willingly admitted that they were not United States citizens and had no valid identification cards. Officer Quintanilla then requested the assistance of surrounding Border Patrol Agents. Agent Ornelas conducted an interview of all passengers seated inside the vehicle to determine alienage. The subjects admitted they had illegally entered into the United States and did not possess the documents that would allow them to enter or remain in the United States legally. Juan Carlos Hernandez-Ramirez and the eight Undocumented Aliens were arrested and transported to the McAllen Border Patrol Station for further processing.

PRINCIPAL: Juan Carlos Hernandez-Ramirez

Juan Carlos Hernandez-Ramirez was advised of his Miranda Rights, acknowledged he understood his rights and agreed to answer any questions without the presence of a lawyer.

Juan Carlos Hernandez-Ramirez, a citizen and national of Mexico illegally in the United States, told agents he was hired to picking up illegal aliens near Sullivan City, Texas. Hernandez-Ramirez stated to agent he was told by his brother Eduardo Garcia, as to the location of where to pick up the illegal aliens. Hernandez further stated he was going to be paid \$1200.00 USD per subject he picked up.

MATERIAL WITNESS STATEMENTS:

Ramon Adalberto Lobo-Hernandez and Samuel Martinez-Abelino were both advised of their Miranda Rights, stated they understood their rights and were willing to speak without the presence of a lawyer.

MATERIAL WITNESS: Ramon Adalberto Lobo-Hernandez

Ramon Adalberto Lobo-Hernandez, a citizen and national of Honduras, stated after crossing the Rio Grande River illegally his group where given directions to walk north towards a road and a vehicle was going to pick them up. Lobo told agents the group walked to a brushy area by the road to wait for the pickup vehicle. Lobo added that he was then told, by another aliens in the group, a beige vehicle was to pick them up. He stated that a beige vehicle arrived and the driver told them to get in and make themselves conformable. Additionally, Lobo stated when the vehicle was pulled over by the police, the driver did not tell them anything before the police encounter, and the driver did not exit the vehicle before the stop. He described the driver as young, skinny, wearing a black cap, a black shirt, and was wearing shorts. Matching the principals clothing description and appearance but he did not want to identify him in the lineup.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
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CONTINUATION:

MATERIAL WITNESS: Samuel Martinez-Abelino

Samuel Martinez-Abelino, a citizen and national of Mexico, told agents he was to pay \$1,200 to be smuggled into the United States. Martinez-Abelino stated after crossing the Rio Grande River illegally the group was instructed to walk north away from the river towards a road and wait in a brushy area by the road. Martinez added the group was picked up by a beige four door vehicle and the driver told him to get in the vehicle. Martinez-Abelino then said they were pulled over by police and the driver did not tell them anything. Additionally, he described the driver as wearing a black cap, a short sleeve black shirt, and shorts. He stated the driver looked real young and skinny. Matching the principals clothing description and appearance but he did not want to identify him in the lineup.